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Attorneys for Defendants HILTON
WORLDWIDE HOLDINGS, INC. and
HILTON GRAND VACATIONS
COMPANY, INC.

United States District Court
Northern District of California

TIMOTHY ELDER, individually
and on behalf of all others similarly
situated,

Plaintiff,

vs.

HILTON WORLDWIDE
HOLDINGS, INC. and HILTON
GRAND VACATIONS
COMPANY, INC.,

Defendant.

Case No. 3:16-cv-00278

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING DEADLINES IN
LIGHT OF SETTLEMENT**

Action Filed: January 15, 2016

1 Plaintiff Timothy Elder ("Plaintiff"), Defendants Hilton Worldwide Holdings
2 Inc. and Hilton Grand Vacations Company, LLC (collectively, "Hilton"), and
3 Blackhawk Engagement Solutions, Inc. ("Blackhawk") (collectively "the parties"),
4 through their respective counsel of record, hereby stipulate and agree as follows:

5 WHEREAS, Plaintiff filed this action on January 15, 2016;

6 WHEREAS, on March 22, 2017, Plaintiff filed his First Amended Class
7 Action Complaint. Dkt. No. 55;

8 WHEREAS, on January 3, 2018, the Court referred this matter to the
9 Honorable Joseph C. Spero for a settlement conference. Dkt. No. 100;

10 WHEREAS, the parties participated in a settlement conference with Judge
11 Spero on February 8, 2018 and a settlement in principle was reached. Dkt. No. 121;

12 WHEREAS, the parties have executed a settlement term sheet resolving the
13 claims in this action;

14 WHEREAS, the parties have agreed to prepare a formal settlement
15 agreement whereby they intend to resolve the entire action as to all parties and have
16 agreed to move for preliminary approval of the settlement on or before April 13,
17 2018;

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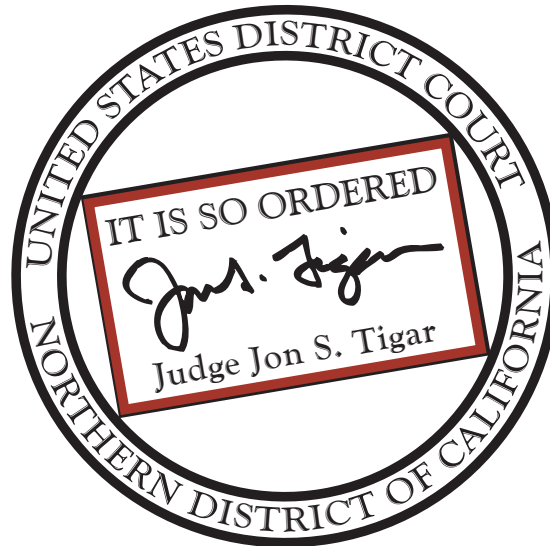
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1 NOW THEREFORE, the parties, by and through their respective counsel of
2 record and subject to the Court's approval, hereby stipulate as follows:

- 3 1. The pending deadlines for all parties shall be extended until 30 days after the
4 motion for preliminary approval of the settlement is decided.
5 2. Plaintiff and Hilton agree that Plaintiff shall file its unopposed motion for
6 preliminary approval of the settlement on or before April 13, 2018.
7 3. The proposed preliminary approval Order to be submitted in conjunction
8 with Plaintiff's unopposed motion for preliminary approval shall vacate all
9 deadlines except as specifically related to settlement of this matter.
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11 **SIGNATURES APPEAR ON THE FOLLOWING PAGES**
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1 Dated: March 15, 2018

2 DLA PIPER LLP (US)

3 By/s/ Angela C. Agrusa

4 ANGELA C. AGRUSA
5 Attorneys for Defendants HILTON
6 WORLDWIDE HOLDINGS, INC. and
7 HILTON GRAND VACATIONS
8 COMPANY, INC.

9 BURSOR & FISHER, P.A.

10 By: /s/ L. Timothy Fisher

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8 *Attorneys for Defendant Blackhawk
9 Engagement Solutions, Inc.*

10 **SIGNATURE CERTIFICATION**

11 I hereby certify that the content of this document is acceptable to L. Timothy
12 Fisher and Jana Eisinger, counsel for Plaintiff, and Matthew D. Pearson and Jason
13 F. Hoffman, attorneys for Defendant Blackhawk Engagement Solutions, Inc., and I
14 have obtained authorization to affix an electronic signature to this document.

15 Dated: March 15, 2018

16 DLA PIPER LLP (US)

17 By /s/ Angela C. Agrusa

18 ANGELA C. AGRUSA
19 Attorneys for Defendants HILTON
20 WORLDWIDE HOLDINGS, INC. and
21 HILTON GRAND VACATIONS
22 COMPANY, INC.